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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 **-oOo-**

9 UNITED STATES OF AMERICA,)

10 Plaintiff,)

11 vs.)

12 KEVIN WRIGHT,)

13 Defendant.)
14

) No. 2:08-cr-178-PMP-RJJ

) **GOVERNMENT'S MOTION**
) **FOR CONTINUANCE**

15 COMES NOW the United States of America, by and through DANIEL G. BOGDEN, United
16 States Attorney, and ADAM M. FLAKE, Assistant United States Attorney, and respectfully requests
17 this court to enter an order granting the Government's motion to continue the date for the response
18 to defendant Kevin Wright's motion under 28 U.S.C. § 2255, which Wright filed on or about March
19 9, 2011.

20 On March 22, 2011, the Court ordered the Government to respond to this motion by April
21 22, 2011. By this motion, the United States requests that the deadline be continued until May 22,
22 2011.

23 As grounds for this motion, the Government avers as follows:

24 1. Undersigned counsel, who is responsible for responding to Wright's motion, is
25 presently reviewing the record. Among the issues raised are the conduct and competence of Nelson's
26 . . .

1 former counsel and the amount of loss. These issues will require review of the record and legal
2 research.

3 2. This is the Government's first request for an extension of time to file its response.
4 Undersigned counsel avows that he has exercised diligence since being assigned this matter; that he
5 seeks this extension in good faith and not for purposes of delay; and that he anticipates that the
6 response will be filed within the additional time requested.

7 3. To the undersigned's knowledge, Wright is not represented by counsel. The
8 undersigned has not spoken with Wright, but does not have any reason to believe Wright has any basis
9 to oppose this request.

10 DATED: this 7th day of April, 2011.

11 Respectfully submitted,

12 DANIEL G. BOGDEN
13 United States Attorney

14 /s/ Adam M. Flake
15 ADAM M. FLAKE
16 Assistant United States Attorney
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DATED: this _7th day of April, 2011.

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

Pursuant to the rules of the above court, I hereby certify that I am an employee of the United States Attorney's Office, United States Department of Justice, and that on April 7, 2011, I caused the foregoing document, GOVERNMENT'S MOTION FOR CONTINUANCE, to be delivered to all parties to this action by e-service.

/S/ Terrie Murray
Terrie Murray
Legal Assistant